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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
 DEVELOPMENT, LLC, a Delaware Limited
 Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
 TIMESHARE EXIT TEAM, a Washington
 Limited Liability Company; BRANDON REED,
 an individual and citizen of the State of
 Washington; TREVOR HEIN, an individual and
 citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO FILE REPLY
 IN SUPPORT OF MOTION TO
 COMPEL [ECF #278]**

[Second Request]

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Schroeter Goldmark & Bender, P.S. (“Defendant”) hereby stipulate to extend Plaintiff’s deadline to file a Reply in support of Plaintiff’s Motion to Overrule SGB’s Privilege and Work Product Claims and Compel Discovery [ECF #278] (the “Motion”), currently set for September 25, 2020 until September 28, 2020, and as grounds state as follows:

1. Plaintiff filed the Motion on August 11, 2020.
2. Defendant filed its Opposition on September 11, 2020, after a brief extension to its response deadline.
3. As the Court is aware, the question of whether the attorney-client and work product privileges apply in this case is a fundamental issue in discovery.
4. Defendant’s Opposition presents new documents, including a significant supplements to Defendant’s privilege log that were served concurrently with Defendant’s Opposition.
5. The Parties previously stipulated to extend Plaintiff’s dedline by one week to evaluate the newly-disclosed documents, however Plaintiff has not been able to complete these tasks as quickly as expected.
6. Diamond is working diligently on its Reply.
7. In order to adequately respond to Defendant’s Opposition, and the issues presented therein, the Parties agree that Plaintiff’s deadline to file its Reply in support of the

Motion be extended one (1) business day, up to and including September 28, 2020

8. This is the Parties' second request for extension of this deadline, and it is not intended to cause any delay or prejudice to any party. Defendant does not object to the requested extension.

Dated this 25th day of September, 2020

GREENSPOON MARDER, LLP

LIPSON NEILSON, P.C.

/s/ Phillip A. Silvestri
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Attorneys for Defendant
Schroeter, Goldmark & Bender, P.S.

IT IS SO ORDERED


UNITED STATES MAGISTRATE
JUDGE

9-25-2020
DATED: _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 25th day of September 2020. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

/s/ Phillip A. Silvestri

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